

In light of the privacy interests at stake, ECF No. 37-3 is to remain under seal, viewable only by the parties and court personnel. Leave to refile is granted.



HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

THE CITY OF NEW YORK May 1, 2024  
**LAW DEPARTMENT**

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April 30, 2024

**VIA ECF**

Hon. Alvin K. Hellerstein  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *J.H. v. New York City Dep't of Educ.*, 23-cv-4753 (AKH)(BCM)

Dear Judge Hellerstein:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on administrative hearings under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request that Exhibit C to my Declaration in opposition to Plaintiff's motion for fees (ECF 37-3) be sealed, and that Defendant be allowed to submit a redacted document. The document filed inadvertently included the student's name. I have already contacted the Court's ECF Error email account asking that ECF 37-3 be temporarily sealed pending a request to the Court. I apologize for this oversight, and reviewed the documents in opposition submitted by Defendant to make sure there are no other documents needing redactions.

Thank you for considering this request.

Respectfully submitted,

/s/ Marina Moraru

Marina Moraru, Esq.  
Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)  
Benjamin Hinerfeld (via ECF)